

**Remarks**

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-24 are pending in the application, with claims 1, 8, 13, and 20 being the independent claims. Claims 1, 8, 11, 13-15, 17-21, 23, and 24 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 103***

In section 3 of the Office Action, claims 1-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,901,049 to Chapman (hereinafter Chapman) in view of U.S. Patent No. 6,032,197 to Birdwell *et al.* (hereinafter Birdwell). Applicants respectfully traverse this rejection.

Applicants assert that the Office Action does not establish a *prima facie* case of obviousness for at least the reason that Chapman and Birdwell, alone or in any rational combination, do not teach each and every feature of the claims. (See MPEP 2143).

**Claims 1-24**

Independent claim 1, as amended, calls for *transmitting a delta-encoded value for each non-redundant field in said second protocol header of said subsequent TCP protocol packet, wherein said delta-encoded value represents a change in value from a respective non-redundant field in said first protocol header of said first TCP protocol packet.*

The Office Action concedes that Chapman does not specifically teach this feature of Applicants' claim 1. Instead, the Office Action relies on Col. 1, lines 26-58, Col. 2, lines 19-32 and 48-56, and Col. 6, lines 1-9 of Birdwell to allegedly teach this feature. In Birdwell, Col. 1, lines 19-56 describe a technique for compressing packet headers (referred to as the Jacobson technique), and the remaining cited material describes a packet header compression technique that improves upon the Jacobson compression scheme.

Upon inspection, the Jacobson technique for compressing packet headers does not appear to have anything to do with delta encoding at all. Instead, the Jacobson technique merely reduces a 40-byte TCP/IP packet header to a three-byte compressed header, such that the compressed header has an encoded change to the packet ID, a TCP checksum, a connection number, and a change mask. In fact, the compressed header having the change mask appears to teach away from *transmitting a delta-encoded value for each non-redundant field in said second protocol header of said subsequent TCP protocol packet, wherein said delta-encoded value represents a change in value from a respective non-redundant field in said first protocol header of said first TCP protocol packet*, as set forth in Applicants' claim 1.

Moreover, the remaining cited material merely describes a packet header compression technique in which non-changing header fields are removed from a compressed header. Birdwell explains,

[T]he packet header compressor 32 forms a compressed header from the fields of an associated uncompressed header. Preferably, the packet header compressor 32 forms a compressed header having those fields that are subject to change from packet-to-packet, but not all of the fields in a normal uncompressed header.

Birdwell, Col. 5, lines 20-25.

Birdwell further explains,

***The fields that are common to both the compressed and uncompressed headers are identical. That is, the fields themselves are not compressed.*** The 16-bit packet identification field, for example, is the same in both uncompressed headers and compressed headers. Compression is achieved by removing the non-changing header fields from the compressed header.

Birdwell, Col. 5, lines 31-37 (*emphasis added*).

Not compressing fields that are common to both the compressed and uncompressed headers is not the same as, and in fact teaches away from, *transmitting a delta-encoded value for each non-redundant field*, as set forth in Applicants' claim 1. Thus, even the cited material that describes the improved packet header compression technique teaches away from *transmitting a delta-encoded value for each non-redundant field in said second protocol header of said subsequent TCP protocol packet, wherein said delta-encoded value represents a change in value from a respective non-redundant field in said first protocol header of said first TCP protocol packet*, as set forth in Applicants' claim 1.

Thus, Applicants assert that Birdwell does not provide the teachings missing from Chapman. Therefore, Applicants assert that independent claim 1, as amended, is patentable over Chapman and Birdwell, alone or in any rational combination.

Independent claims 8, 13, and 20, all as amended, also distinguish over Chapman and Birdwell, alone or in any rational combination, for reasons similar to those set forth above with respect to independent claim 1, as amended, and further in view of their own respective features.

Furthermore, claims 2-7, which depend from independent claim 1, claims 9-12, which depend from independent claim 8, claims 14-19, which depend from independent claim 13, and claims 21-24, which depend from independent claim 20, also distinguish over Chapman and Birdwell, alone or in any rational combination, for reasons similar to those set forth above with respect to independent claim 1, as amended, and further in view of their own respective features.

Therefore, for at least the reasons set forth above, reconsideration and withdrawal of the rejection of claims 1-24 is respectfully requested.

***Conclusion***

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Robert Sokohl  
Attorney for Applicants  
Registration No. 36,013

Date: 11/23/05

1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600

454957v2